

"Varghese, Lesley M."
<lvarghese@sandw.com>

03/03/2008 11:54 AM

To <anna_gercas@nysd.uscourts.gov>

cc <info@whiteandcirrito.com>, "Pollack, Barry S."
<bpollack@sandw.com>, "Sweeney, Mary Cecilia"
<msweeney@sandw.com>

bcc

Subject Lockwood et al. v. Maceda 07CV7524

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3-4-08

07cv7524

Dear Anna:

Thank you for speaking with me this morning. As we discussed, in order to accommodate settlement efforts, the parties have agreed to stay their current briefing schedule for summary judgment pleadings in the above-referenced action. In the event that current settlement efforts are unsuccessful, the parties have agreed that the plaintiff will have 2 weeks to file its responses to the defendant's 2/15/08 filings. Parties will subsequently have 2 additional weeks in which to file any further replies. Per our conversation, these extensions do not ostensibly impact the 5/15/08 dispositive motions deadline in Judge Baer's pre-trial order. (Should the parties ultimately require an extension of the 5/15/08 deadline, I understand that we are advised to communicate that to the Court by fax.) Thanks again for your assistance.

Regards,

Lesley M. Varghese
Attorney at Law

Sullivan & Worcester LLP
One Post Office Square
Boston, MA 02109

T 617 338 2835
F 617 338 2880
lvarghese@sandw.com
www.sandw.com

BOSTON NEW YORK WASHINGTON, DC

*This is so long for me to read
I think it's best to just read it once
and then move on. I don't think we have to
worry about this trial for a while and I think we can do
this trial with the help of the court and the judge.
I think it's best to just read it once and move on.
Signed: Howard Baer
3/4/08*

This message is intended to be confidential and may be legally privileged. It is intended solely for the addressee. If you are not the intended recipient, please delete this message from your system and notify us immediately. Any disclosure, copying, distribution or action taken or omitted to be taken by an unintended recipient in reliance on this message is prohibited and may be unlawful.

Communications from our firm may contain or incorporate federal tax advice. Under US Internal Revenue Service (IRS) standards, we are required to inform you that only formal, written tax opinions meeting IRS requirements may be relied upon by taxpayers for the purpose of avoiding tax-related penalties. Accordingly, this communication is not intended or written to be used, and it cannot be used, for the purpose of avoiding tax-related penalties under the Internal Revenue Code. Please contact a member of our law firm's Tax Department if you require a formal, written tax opinion that satisfies applicable IRS requirements, or if you have any other questions regarding

ENDORSEMENT:

THIS, SO LONG AS IT DOESN'T EFFECT THE LAST DAY FOR MOTIONSIS FINE, BUT
KEEP IN MIND THE TRIAL MONTH NEVER CHANGES - YOU PICKED THE IT - AND IF
I DON'T DECIDE YOUR MOTION IN TIME WE GO TO TRIAL.